

REMARKS

Claims 33-60 remain in the present application. Claims 33, 39, 45, 51 and 56 are amended herein. Applicants respectfully submit that no new matter has been added as a result of the claim amendments. Applicants respectfully request further examination and reconsideration of the rejections based on the arguments set forth below.

Claim Rejections – 35 U.S.C. §112

Claims 33-60 are rejected under 35 U.S.C. §112, first paragraph, as allegedly failing to comply with the enablement requirement. More specifically, the rejection states that the limitations of “location identifier,” “storing a plurality of location identifiers comprising a location identifier of a removable memory” and “associating said location identifier of said removable memory with said file,” as recited in independent Claims 33, 39, 45, 51 and 56, are not taught in the specification to enable one of ordinary skill in the art to make and/or use the invention. Applicants disagree for the reasons discussed below.

The specification describes “categories” as locations where files, applications, and the like, may be stored (page 15, lines 19-20). In this manner, “categories” may be considered “location identifiers” as claimed. Accordingly, Applicants respectfully submit that the limitations of “location identifier” as recited in independent Claims 33, 39, 45, 51 and 56, are taught in the specification to enable one of ordinary skill in the art to make and/or use the invention.

Additionally, Figure 10 shows the display of a plurality of categories within drop-down menu 150, where the category "card" is a location identifier for a removable memory (page 21, lines 11-12). The specification also describes that information used to generate the displayed images is stored within a memory of the portable electronic device (page 13, lines 13-23). Accordingly, Applicants respectfully submit that the limitations of "storing a plurality of location identifiers comprising a location identifier of a removable memory" as recited in independent Claims 33, 39, 45, 51 and 56, are taught in the specification to enable one of ordinary skill in the art to make and/or use the invention.

Further, the specification describes changing a category associated with an application to a category associated with a removable memory (page 20, lines 11-12). Accordingly, Applicants respectfully submit that the limitations of "associating said location identifier of said removable memory with said file" as recited in independent Claims 33, 39, 45, 51 and 56, are taught in the specification to enable one of ordinary skill in the art to make and/or use the invention.

For the reasons discussed above, Applicants respectfully submit that independent Claims 33, 39, 45, 51 and 56 comply with 35 U.S.C. §112, first paragraph. Since dependent Claims 34-38, 40-44, 46-50, 52-55 and 57-60 recite further limitations to the invention claimed in their respective independent Claims, dependent Claims 34-38, 40-44, 46-50, 52-55 and 57-60 also comply with 35 U.S.C. §112, first paragraph.

Claim Rejections – 35 U.S.C. §102

Claims 33-34, 39-40 and 45-46

Claims 33-34, 39-40 and 45-46 are rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent Application Publication Number 2004/0048503 by Mills et al. (hereafter referred to as "Mills"). Applicants have reviewed the cited reference and respectfully submit that the embodiments of the present invention as recited in Claims 33-34, 39-40 and 45-46 are neither anticipated nor rendered obvious by Mills for the following reasons.

Applicants respectfully direct the Examiner to independent Claim 33 that recites a method of copying files comprising (emphasis added):

storing a plurality of location identifiers comprising a location identifier of a removable memory, said removable memory detachably coupled to a portable electronic device;

in response to a user selection of a file to copy to said removable memory, associating said location identifier of said removable memory with said file; and

in response to said associating, automatically copying said file from a memory of said portable electronic device to said removable memory.

Independent Claims 39 and 45 recite limitations similar to independent Claim 33.

Claims 34, 40 and 46 depend from their respective independent Claims and recite further limitations to the claimed invention.

Applicants respectfully submit that Mills fails to teach or suggest the limitations of "automatically copying said file from a memory of said portable electronic device to said removable memory" as recited in independent Claim 33.

As recited and described in the present application, a file is automatically copied

from a memory of a portable electronic device to a removable memory detachably coupled to the portable electronic device.

In contrast to the claimed embodiments, Applicants understand Mills to teach downloading information from the Internet to an expansion card (paragraph 78). However, downloading information from the Internet to an expansion card as taught by Mills is very different from copying a file from a memory of a portable electronic device to a removable memory since the Internet is not a memory of a portable electronic device as claimed. Accordingly, Applicants reiterate that Mills fails to teach or suggest the limitations of “automatically copying said file from a memory of said portable electronic device to said removable memory” as recited in independent Claim 33.

For these reasons, Applicants respectfully submit that independent Claim 33 is neither anticipated nor rendered obvious by Mills, thereby overcoming the 35 U.S.C. §102(e) rejection of record. Since independent Claims 39 and 45 recite limitations similar to those discussed above with respect to independent Claim 33, independent Claims 39 and 45 also overcome the 35 U.S.C. §102(e) rejections of record. Since dependent Claims 34, 40 and 46 recite further limitations to the invention claimed in their respective independent Claims, dependent Claims 34, 40 and 46 are also neither anticipated nor rendered obvious by Mills. Therefore, Claims 33-34, 39-40 and 45-46 are allowable.

Claims 51-52 and 56-57

Claims 51-52 and 56-57 are rejected under 35 U.S.C. §102(e) as being anticipated by Mills. Applicants have reviewed the cited reference and respectfully submit that the embodiments of the present invention as recited in Claims 51-52 and 56-57 are neither anticipated nor rendered obvious by Mills for the following reasons.

Applicants respectfully direct the Examiner to independent Claim 51 that recites a method of copying files comprising (emphasis added):

storing a plurality of location identifiers comprising a location identifier of a removable memory and a location identifier of a memory of a portable electronic device, wherein said removable memory is detachably coupled to said portable electronic device;
in response to a user selection of a file to copy from said removable memory, associating a location identifier of said memory with said file; and
in response to said associating, automatically copying said file from said removable memory to said memory.

Independent Claim 56 recites limitations similar to independent Claim 51. Claims 52 and 57 depend from their respective independent Claims and recite further limitations to the claimed invention.

Applicants respectfully submit that Mills fails to teach or suggest the limitations of “automatically copying said file from said removable memory to said memory” as recited in independent Claim 51. As recited and described in the present application, a file is automatically copied from a removable memory to a memory of a portable electronic device.

In contrast to the claimed embodiments, Applicants understand Mills to teach downloading information from the Internet to an expansion card (paragraph 78). However, downloading information from the Internet to an expansion card as taught by Mills is very different from copying a file from a removable memory to a memory of a portable electronic device since the Internet is not a removable memory as claimed. Accordingly, Applicants reiterate that Mills fails to teach or suggest the limitations of “automatically copying said file from said removable memory to said memory” as recited in independent Claim 51.

For these reasons, Applicants respectfully submit that independent Claim 51 is neither anticipated nor rendered obvious by Mills, thereby overcoming the 35 U.S.C. §102(e) rejection of record. Since independent Claim 56 recites limitations similar to those discussed above with respect to independent Claim 51, independent Claim 56 also overcome the 35 U.S.C. §102(e) rejections of record. Since dependent Claims 52 and 57 recite further limitations to the invention claimed in their respective independent Claims, dependent Claims 52 and 57 are also neither anticipated nor rendered obvious by Mills. Therefore, Claims 51-52 and 56-57 are allowable.

Claim Rejections – 35 U.S.C. §103

Claims 35-38, 41-44, 47-50, 53-55 and 58-60 are rejected under 35 U.S.C. §103(a) as being unpatentable over Mills in view of United States Patent Number 7,003,327 to Payne et al. (hereafter referred to as “Payne”). Applicants have reviewed the cited references and respectfully submit that the embodiments

of the present invention as recited in Claims 35-38, 41-44, 47-50, 53-55 and 58-60 are not rendered obvious by Mills in view of Payne for the following reasons.

Applicants respectfully submit that Payne, either alone or in combination with Mills, fails to cure the deficiencies of Mills discussed herein. For example, Applicants respectfully submit that Payne also fails to teach or suggest the limitations of "automatically copying said file from a memory of said portable electronic device to said removable memory" as recited in independent Claim 33 and "automatically copying said file from said removable memory to said memory" as recited in independent Claim 51.

Since Claims 35-38, 41-44, 47-50, 53-55 and 58-60 recite further limitations to the invention claimed in their respective independent Claims, dependent Claims 35-38, 41-44, 47-50, 53-55 and 58-60 are also not rendered obvious by Mills in view of Payne. Therefore, Claims 35-38, 41-44, 47-50, 53-55 and 58-60 are allowable.

CONCLUSION

Applicants respectfully submit that Claims 33-60 are in condition for allowance and Applicants earnestly solicit such action from the Examiner.

The Examiner is urged to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 50-4160.

Respectfully submitted,

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/BMF/

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